BRYAN, CAVE, MSPHEETERS & MSROBERTS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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ROBERT F. VAN VOORHEES

1015 FIFTEENTH STREET, N.W.

WASHINGTON, D.C. 20005-2689

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TELEX: 248429 BCMM UR

500 NORTH BROADWAY

ST. LOUIS, MISSOURI 63102-2186

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TELEX. 4312030 BCMM STL

3100 CROCKER CENTER
333 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 80071-3171
(213) 628-8000
TELEX 4720314 BCMM LSA

350 PARK AVENUE NEW YORK, NEW YORK, 10022-6022 (212) BB8-1199 TELEX: 425757 BCMM NYK

July 10, 1987

US EPA RECORDS CENTER REGION 5



Bruce Carlson
Staff Attorney
Enforcement Programs
Division of Land Pollution Control
Illinois Environmental Protection Agency
220 Churchill Road
Springfield, IL 62706

Dear Bruce:

As promised, we are enclosing a revised RCRA Part A application for Chemetco. The application deletes all units previously listed on Chemetco's 1985 Part A application, with the exception of the zinc oxide storage pile that is contained within the concrete "zinc oxide bunker." Given the period during which this material has been stored, Chemetco has concluded that interim status must be retained to allow for speculative accumulation of this otherwise unregulated recyclable material.

We are also enclosing a memorandum that explains the status of each other item that has been deleted from either the 1980 or 1985 RCRA Part A application. As we discussed, this memorandum explains the grounds on which Chemetco has concluded that these other units are not subject to RCRA requirements, including closure requirements.

I trust that this submission will provide an adequate basis for our further discussions about the site investigation plan. Please call me if you have any questions.

Sincerely,

Robert J. Van Jamine Coma

Robert F. Van Voorhees

/1h

cc: Roger Grimes, Esq.

41 Jan

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OTHER EXISTING ILLINOIS ENVIRONMENTAL PERMITS

- 1. Construction Permit No. 81060046 for the fourth rotary converter.
- 2. Operating Permit No. 8207005 for air pollution control equipment.
- 3. Operating Permit No. 86040033 for baghouses.

Title-in elees are exercise on eller the	U.S. ENVIRONMENTAL PROTECTION AGENCY LEPALD, NUMBER						
A LDV	HAZARD S WASTE PERMIT APPLICATION						
RCRA VELLA	Consolidated Permis Program [This Information is required under Section 3005 of RCRA]						
FOR OFFICIAL USE ONLY							
APPLICATION DATE RECEIVED	COMMENTS .						
II. FIRST OR REVISED APPL	ICATION CONTRACTOR OF THE PROPERTY OF THE PROP						
Place an "X" in the appropriate box	k in A or 8 below <i>(mark one box only)</i> to indicate whether this is the first application you are submitting for your facility or a lirst application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's						
EPA I.D. Number in Item I above.							
· · ·	no an "X" below and provide the appropriate date) (See instructions for definition of "existing" facility. [See instructions for definition of "existing" facility. [See instructions for definition of "existing" facility.						
R	Complete item below.) FOR NEW FACILITIES PROVIDE THE DATE						
	R EXISTING FACILITIES, PROVIDE THE DATE (97., Mo., 6 MS)						
10 7 10 17 10 17 TO	(place an "X" below and complete Item I above)						
YI. FACILITY HAS INTER	71						
Ш. PROCESSES – CODES AN	VD DESIGN CAPACITIES						
A. PROCESS CODE - Enter the co	ode from the first of process codes below that ? ast describes each process to be used at the facility. Ten lines are provided for a needed, enter the code is) in the space provided. If a process will be used that is not included in the list of codes below, then						
	is design capacity) in the space provided on the form (Itam III-C).						
	— For each code entered in column A enter the capacity of the process.						
	each amount entered in column B(1), enter the code from the flat of unit measure codes below that describes the unit of						
measure used. Only the unit	s of measure that are listed below should be used. PRO- APPROPRIATE UNITS OF PRO- APPROPRIATE UNITS OF						
A movere	CESS MEASURE FOR PROCESS						
PROCESS Storage:	CODE DESIGN CAPACITY PROCESS CODE DESIGN CAPACITY Trestment:						
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WASTE PILE	903 CUBIC YARDS OR SURFACE IMPOUNDMENT TO SALLONS PER DAY OR CUBIC METERS HICINERATOR TOS PER HOUR OR						
SURFACE IMPOUNDMENT Disposal:	METRIC TONS PER HOUR; GALLONS PER HOUR OR						
INJECTION WELL	D79 GALLONS OR LITERS D80 ACRE-FEET (the volume that OTHER (Use for physical chemical TS4 GALLONS PER DAY OR						
	depth of one foot) DR processes not occurring in tunks, in the second se						
LAND APPLICATION	HECTARE-METER gurface impoundments or incinent D81 ACRES OR HECTARES allow. Describe the processes in D82 GALLONS PER DAY OR She spece provided; Item III-C.)						
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UNIT OF MEASURE	MEASURE CODE UNIT OF MEASURE CODE UNIT OF MEASURE CODE						
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CUBIC MARDS	ACRES						
EXAMPLE FOR COMPLETING IT	W LITERS PER HOUR						
other can hold 400 gallons. The fac	cility also has an incinerator that can burn up to 20 gallons per hour.						
C DUP							
B. PROCESS	DESIGN CAPACITY B. PROCESS DESIGN CAPACITY						
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SPACE FOR ADDITIONAL PROCESS CODES OR INCLUDE DESIGN CAPACITY.

V. DESCRIPTION OF BAZARDOUS WASTES

LEPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpert D for each listed hazardous waste you will handle. If you handle hazardous wester which are not listed in 40 CFR, Subpart D, enter the four-digit number/al from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed wests entered in column A estimate the quantity of that wasts that will be handled on an annual basis. For each characteristic or taxic contaminant entered in column A estimate the total annual quantity of all the non-disted weste all that will be handled which possess that characteristic or contaminant.

🚉 UNIT OF MEASURE -- For each quantity entered in column 8 enter the unit of measure code, Units of measure which must be used and the appropriate MINISTER OF CONTINUE OF THE CO codes are: ٠.

CODE METRIC UNIT OF MEASURE CODE ENGLISH UNIT OF MEASURE POUNDS.,.... KILOGRAMS........

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the wasts.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/a/ from the list of process codes contained in Item III to indicate how the weste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous westes: For each characteristic or toxic conteminant entered in column A, select the sode/a/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wester that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- ore than one EPA Hazardous Waste Number shall be described on the form as follows:

 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete solumns B.C. and D by astimating the total ennual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make so other antries on that line,
- 2. Report step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat end dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation, in addition, the facility will treat and dispose of three non-listed wastes. Two westes are corrosive only and there will be an estimated 200 pounds per year of each weste. The other waste is corrosive and ignitiable and there will be an estimated 100 pounds per year of that wasts. Treatment will be in an incinerator and disposal will be in a landfill.

1			A. EPA AZARD. B. ESTIMATED ANNUAL		C. UNI		117		D. PROCESSES										
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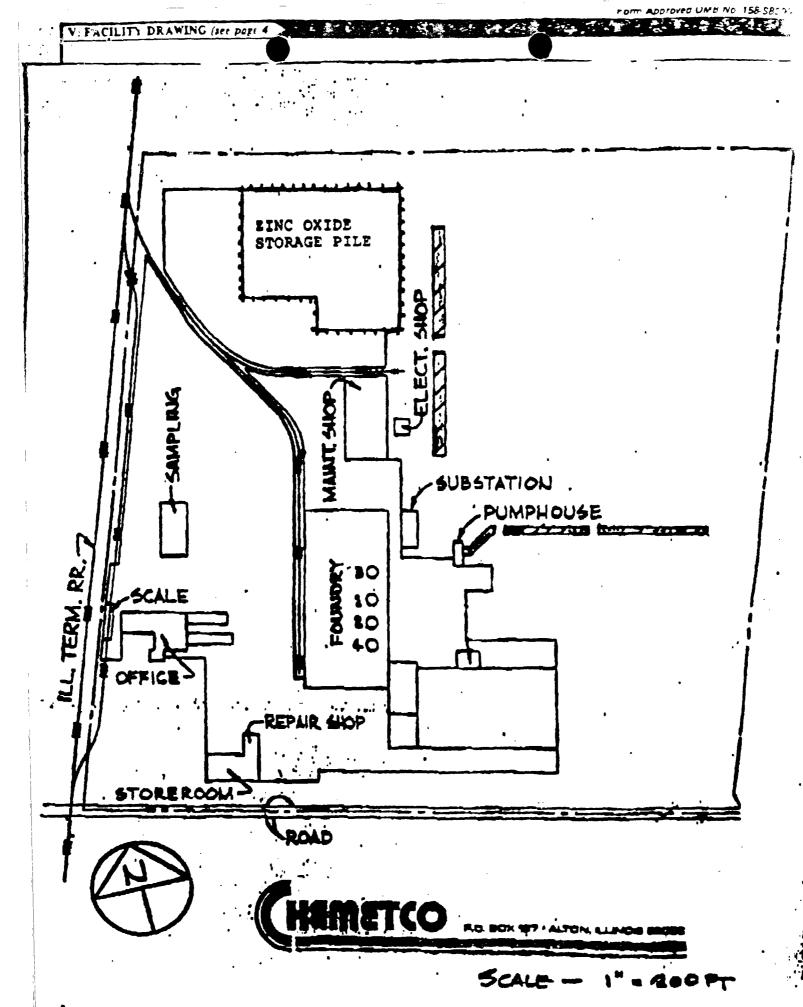
EPA Form 3610-3 (8-80)

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CONTINUE ON PAGE :

IV. Description of Hazardous Wastes

Chemetco is filing this Part A application to allow storage in a concrete-lined storage pile of recyclable zinc oxide material when it is accumulated speculatively. The material stored in the pile will be a RCRA regulated material when it is accumulated speculatively if it has a characteristic of EP toxicity, but the zinc oxide material is not a hazardous waste per se. The zinc oxide is being stored for sale and reclamation, not for treatment or disposal as a hazardous waste.



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REVISED PART A RCRA APPLICATION FOR CHEMETCO, INC. (ILD 048843809)

Submitted to the Illinois Environmental Protection Agency July 10, 1987

I. INTRODUCTION

Chemetco submits this 1987 revised RCRA Part A application as promised in conjunction with ongoing discussions between Chemetco, Inc., and the Illinois Environmental Protection Agency (IEPA) for resolving RCRA (Resource Conservation and Recovery Act) concerns, including the pending enforcement action filed on behalf of IEPA before the Illinois Pollution Control Board. IEPA v. Chemetco, Inc., PCB 84-178 (filed Dec. 4, 1984). As the following discussion will show, only one of the units listed on Chemetco's previous Part A applications may be subject to regulation as a RCRA storage unit.

Chemetco filed its original RCRA Part A application on November 7, 1980, for a permit to operate a hazardous waste management facility engaged in the storage of hazardous wastes at its Hartford, Illinois plant. Chemetco filed its revised RCRA Part A application on November 8, 1985. In its 1985 revised Part A application Chemetco deleted several units that had been listed unnecessarily on its 1980 original Part A application out of an abundance of caution, but which were not

in fact subject to RCRA regulation. Chemetco listed on its 1985 revised Part A application several units that were entirely prospective and that were never even constructed. As it had done in 1980, Chemetco also listed unnecessarily on its 1985 revised Part A application several units that were not and are not now subject to RCRA regulation. Once again, the listings were protective in nature and based on the belief that the units should be listed to allow Chemetco flexibility to handle materials it thought potentially might be subject to RCRA regulation.

Following a careful reevaluation of its operations under the applicable hazardous waste regulations, Chemetco has decided to revise its largely protective and prospective 1985 Part A application in order to reflect accurately current operations at its Hartford plant. Chemetco has concluded that only one unit on its premises, the zinc oxide storage pile, should be listed on the 1987 revised Part A application it is now submitting and that the remainder of the units listed on Chemetco's previous Part A applications should be deleted. This memorandum discusses the reasons for the revisions reflected in Chemetco's 1987 Part A application and explains why the deleted units listed on the previous Part A applications need not be "closed" pursuant to 35 Ill. Adm. Code \$\$725.210 et seg.

II. CHEMETCO'S 1987 REVISED RCRA PART A APPLICATION

The accompanying 1987 revised Part A application

(Exhibit "A") lists Chemetco's zinc oxide storage pile, also referred to as the zinc oxide storage bunker, with process code \$03, indicating a storage pile, and a design capacity of approximately \$0,000 cubic yards. Prior to construction of the containment bunker, the storage pile itself was included in the listing on Line 1 of Part III of Chemetco's original Part A application filed November 7, 1980 (Exhibit "B"), where it comprised approximately 30 percent of the total capacity shown for the listing, */ and on Line 4 of Part III of the revised Part A application filed November 8, 1985 (Exhibit "C").

The storage pile has RCRA interim status and is covered by Chemetco's pending RCRA Part B application filed November 8, 1985. If IEPA would prefer, however, Chemetco will submit a revised Part B application that includes only the zinc oxide storage pile.

Although Chemetco's previous Part A applications have listed the zinc oxide storage pile as a surface impoundment, this characterization of the storage pile was mistaken. The zinc oxide storage pile is not a depression, excavation or

^{*/} The remaining 70 percent of the capacity listed on Line 1 of the 1980 RCRA Part A application consisted of zinc oxide settling pits that are addressed in Part III.A. of this memorandum, at pp. 7-10 below.

diked area designed to hold liquid wastes or wastes containing free liquids, such as a pit, pond or lagoon. Hence the zinc oxide storage pile does not fall within the definition of "surface impoundment" provided in 40 C.F.R. § 260.10 and 35 Ill. Adm. Code § 720.110. Instead, the zinc oxide storage pile consists of a "noncontainerized accumulation of solid, nonflowing" material and is the type of unit defined as a "pile" in § 260.10 and § 720.110. Examination of aerial photographs of the site confirms that the zinc oxide storage pile was indeed a pile, not an impoundment.

The zinc oxide storage pile, which is located at the north end of the Chemetco facility (see map at Exhibit "D"), is used to store the solid material produced by the double quencher Venturi wet scrubber system that captures exhaust gas from the top-blown rotary converters used by Chemetco in its secondary copper smelting operations. In this process a zinc oxide material is washed from the exhaust gas with a water spray. The zinc oxide slurry thus produced is then dewatered as part of the zinc oxide recycling process described further below. Dewatered zinc oxide material produced in the past is stored in the zinc oxide storage pile pending recycling. Chemetco's current production of zinc oxide material, however, is shipped offsite for recycling without being stored in the storage pile.

Chemetco has listed the storage pile on its 1987 revised Part A application because it appears that the zinc

oxide material stored in the storage pile may be considered a RCRA regulated material by reason of speculative accumulation. Accumulation of the zinc oxide material occurred because a depressed world market for zinc had severely limited opportunities for sale of the material. At the present time, however, there are significantly better opportunities to market the zinc oxide material and Chemetco is confident that increased sales will substantially reduce the amount of accumulated zinc oxide material. Chemetco's own recycling efforts may further reduce the inventory of zinc oxide material in its storage pile. As a result of the enhanced likelihood of recycling greater amounts of the zinc oxide material, Chemetco believes that it will qualify for a variance from classification of the zinc oxide material as a solid waste under 40 C.F.R. §§ 260.30 & 260.31 and 35 Ill. Adm. Code §§ 720.130 & 720.131, and therefore intends to submit a formal request for such a variance.

Increased opportunities for recycling the zinc oxide material should enable Chemetco to complete its plans to phase out the zinc oxide storage pile. Chemetco is not presently adding any additional zinc oxide material to the pile and expects to eliminate use of the pile except for short-term storage prior to recycling. For the time being, however, Chemetco has taken significant precautions to prevent material loss and environmental contamination prior to the time when all of the accumulated zinc oxide material is recycled.

Chemetco's zinc oxide storage pile has a complete containment system for the zinc oxide material. An 8-inch reinforced concrete slab resting on the soil at ground level now underlies the zinc oxide pile. The slab is surrounded by a reinforced concrete containment wall. The containment wall is surrounded by a curbed secondary collection system. Chemetco has installed precipitation runoff and run-on control systems for the slag pile. Covering and periodic wetting of the zinc oxide material serve to reduce wind loss of the material.

The concrete containment structure for the zinc oxide pile was constructed in 1984 — the last concrete was poured on October 29, 1984. The structure was built on the same site previously occupied by the zinc oxide pile. Briefly, the construction involved removing the zinc oxide material and any contaminated underlying soil from the storage area to permit pouring the concrete slab and containment walls, and then replacing the zinc oxide material and soil on the slab after construction was completed. The soil underlying the zinc oxide storage pile was sampled and analyzed to eliminate any residual soil contamination.

The construction process for the containment bunker, including sampling and analysis procedures and results, is fully described in the "Zinc Oxide Storage Pile Closure Documentation Report" previously submitted to IEPA for the purpose of providing data and information relevant to the ongoing settlement discussions in the pending enforcement

proceeding. Because the zinc oxide storage pile has not been closed, the report is cited only to demonstrate that Chemetco followed appropriate procedures to eliminate any residual contamination underlying the concrete structure containing the zinc oxide storage pile.

III. STATUS OF UNITS DELETED FROM CHEMETCO'S 1980 ORIGINAL PART A APPLICATION

This section addresses the 1980 original Part A application, discusses each unit listed on that application and explains the reasons for deleting all but one of the units listed therein from subsequent Part A applications. The one unit listed on the 1987 revised Part A application is the zinc oxide storage pile discussed in Part II above.

A. Zinc Oxide Settling Pits

The 1980 original Part A application combined in one listing two separate units: the zinc oxide settling pits and the zinc oxide storage pile discussed above. These units are listed on Line 1 of Part III of the original RCRA Part A application with the process code S04, indicating a storage surface impoundment. As noted above, the zinc oxide storage pile was incorrectly characterized as a surface impoundment and included in this listing, where it comprised 30 percent of the listed capacity. The remaining 70 percent of the listed

capacity consisted of earthen impoundments in existence at the time that were used as settling units in the process of recycling the zinc oxide material.

The zinc oxide settling pits were two parallel dirt-lined excavations approximately 25 feet wide, 180 feet long and 15 feet deep that were located directly to the east of the foundry. These pits were used as settling units for the slurry produced by the wet scrubber system that is used to wash zinc oxide material from the exhaust gas emitted by the rotary converters. The pits were used to allow the zinc oxide material to settle out of the scrubber slurry. After separation of the slurry in the pits, the liquid was returned to the scrubber circuit to collect more solid material. The settled solids were removed from the pits using a clam-shell bucket and were either sold for recycling or taken to the zinc oxide storage pile.

These zinc oxide settling pits were used by Chemetco

for recycling the zinc oxide material. The zinc oxide pits

were an essential part of the zinc oxide recycling process

because settling that occurred in them facilitated the recovery

of metal values and was necessary to material recovery. See 50

Fed. Reg. 614, 639 (Jan. 4, 1985). Dewatering of a sludge of surfacing

prior to further recycling is recognized as part of the

swage is

recycling process. Id.; 48 Fed. Reg. 14472, 14487 (Apr. 4, not returned)

1983). The zinc oxide settling pits were not used for any

other treatment, storage or disposal purpose. The zinc oxide

pits were therefore not RCRA regulated units because the recycling process is exempt from regulation. See 40 C.F.R. § 261.6(c)(1); 35 Ill. Adm. Code § 721.106(c)(1); 50 Fed. Reg. 33541, 33542 (Aug. 20, 1985).

Even though the zinc oxide settling pits were exempt from regulation, Chemetco nevertheless took special precautions to ensure against residual contamination from their operation.

On January 4, 1985, Chemetco began the removal of all residual zinc oxide material and contaminated soil from the pits. This task was completed on February 8, 1985, and is described fully in the "Zinc Oxide Pits Closure Documentation Report" at Tab IV of Chemetco's Comprehensive Proposal for Resolving RCRA Concerns, which was submitted to IEPA October 27, 1986, in order to facilitate settlement of the pending enforcement proceeding and other outstanding RCRA concerns raised by IEPA.

Cleaning of the zinc oxide settling pits was accomplished by excavating the zinc oxide material and inner surface of soil from the pits and hauling the removed material to the zinc oxide storage pile. In order to eliminate residual soil contamination, the soil remaining in the area occupied by the zinc oxide pits was sampled and analyzed. Details and results of the sampling and analysis are included in the closure documentation report. If the soil samples exceeded the EP toxicity level for lead or cadmium further excavation was conducted until sampling and analysis demonstrated that the remaining soil did not exceed the EP toxicity levels for lead

or cadmium. When soil sampling and analysis results proved satisfactory for all portions of the excavated pits, the area was filled.

B. Pot Slag Storage Pile

At the time Chemetco filed its 1980 original Part A application it had on its premises a storage area used for temporary storage of a material referred to as "pot slag." This unit was listed on Line 2 of Part III of the original Part A application with the process code S03, indicating a storage waste pile. The pot slag storage pile was located to the northeast of the foundry. Pot slag is a by-product of Chemetco's secondary smelting operation that is formed in the process of pouring molten metal from the rotary converters into steel pots. The pot slag has metallurgical characteristics different from the other slag by-product ordinarily produced in Chemetco's secondary smelting operation. Pot slag that had cooled and hardened was stored temporarily on the pot slag storage pile before being fed back into the rotary converters for further metal reclamation. The pot slag inventory was constantly being turned over by reintroduction into the rotary converters. The listed pot slag storage pile is no longer in operation. Pot slag contained in the storage pile was completely recycled by returning it to the rotary converters. Because the pot slag consisted of solidified chunks, Chemetco encountered no problems in completely cleaning up the area once occupied by the listed pot slag storage pile.

The pot slag storage pile was not a RCRA regulated unit. Because the pot slag was always returned to the rotary coverters, it was never discarded and thus it could not have been a waste material within the definition of solid waste in the 1980 RCRA regulations. 40 C.F.R. § 261.2 (May 19, 1980). The same result is reached under current regulations. Even assuming that the pot slag exhibited a characteristic of hazardous waste it would not be a solid waste since characteristic by-products are not solid waste when reclaimed. See 40 C.F.R. § 261.2(c)(3) and Table 1; 35 Ill. Adm. Code § 721.102(c)(3) and Appendix Z. The pot slag also would be excluded from classification as solid waste because it was returned directly to the process from which it was generated. See 40 C.F.R. § 261.2(e)(1)(iii); 35 Ill. Adm. Code § 721.102(e)(1)(C). Because the pot slag was not a solid waste it could not have been a hazardous waste. See 40 C.F.R. § 261.3(a); 35 Ill. Adm. Code § 721.103(a).

The pot slag storage pile thus was not used to handle material classified as solid or hazardous waste under the 1980 or subsequent RCRA regulations. The pot slag pile was therefore incorrectly listed on the 1980 original Part A application and has not been a regulated unit at any time thereafter. Moreover, under regulations in effect during the time the pot slag pile existed, the pot slag was not subject to regulation because it was being held for recycling or reclamation. 40 C.F.R. §261.6(a)(2) (May 19, 1980).

C. Black Acid Storage Tank

A material referred to as "black acid" was stored in the tank listed on Line 3 of Part III of the 1980 original Part A application with the process code S02, indicating a storage tank. The tank was located directly south of the tank house building to the southeast of the foundry. The black acid, which consisted primarily of sulfuric acid, was produced by processing a solution resulting from electrolysis operations.

The black acid stored in this listed tank following processing was used beneficially as a product without further processing. For example, some of the black acid was sold for use directly in the pickling process of iron and steel manufacturing. Under the applicable RCRA regulations, the black acid was a product and not a waste material within the definition of solid waste. 40 C.F.R. § 261.2 (May 19, 1980). In any event, the black acid was not subject to regulation because it was being used beneficially or stored for beneficial use. 40 C.F.R. §261.6(a) (May 19, 1980). The black acid tank was therefore not a RCRA regulated unit and need not have been listed on Chemetco's 1980 original Part A application. The listed storage tank is no longer used to store black acid and is now empty.

D. Drums of Trichloroethylene

Chemetco listed two drums containing unused trichloroethylene, a solvent, on Line 4 of Part III of the 1980 original Part A application with the process code S01, indicating a storage container. The trichloroethylene was

being stored at that time for current use as a solvent degreaser in Chemetco's normal maintenance operations. The material was purchased specifically for this purpose. The trichloroethylene was not a hazardous waste because it was not discarded, or intended to be discarded, or used or handled in any other manner that would cause it to fall within the definition of hazardous waste. See 40 C.F.R. §§ 261.2, 261.3, 261.33; 35 Ill. Adm. Code §§ 721.102, 721.103, 721.133. Accordingly, the drums were not regulated storage units and it was not necessary to list them on the 1980 original Part A application. The drums were listed on the original Part A application only because Chemetco had been advised mistakenly that the solvent remaining in an opened drum and held for later use constituted a waste.

The drums of trichloroethylene are no longer on Chemetco's premises. The trichloroethylene was used as a solvent for degreasing piping, valves, meters and fittings in Chemetco's oxygen lines. Because the substance evaporates quickly, it was completely consumed in the process of being used for degreasing. As a consequence, no solid or hazardous waste resulted from the storage and use of the trichloroethylene. After the trichloroethylene in the drums had been used the drums contained no residue because of the rapid evaporation of the material. Even if a minute amount of the material had remained in the drums it would not have been subject to regulation. 40 C.F.R. §261.7; 35 Ill. Adm. Code §721.107.

E. Summary

The preceeding discussion demonstrates that the zinc oxide storage pile is the only unit listed on Chemetco's 1980 original Part A application that may now be a unit subject to RCRA regulation. All of the remaining units have been taken out of operation. Although these units were unregulated, and thus not required to undergo formal RCRA closure, Chemetco made special protective efforts to eliminate any residual environmental contamination resulting from operation of these units.

The focus of these protective efforts has been the former zinc oxide settling pits. Despite the fact that the zinc oxide pits did not require formal RCRA closure, since they were recycling process units, Chemetco has taken those steps to eliminate contamination described in the report previously submitted to IEPA by Chemetco for the purpose of advancing settlement of the pending enforcement proceeding. Chemetco also has proposed to consider the zinc oxide settling pits in the site investigation plan to ensure that no residual contamination of soil or groundwater exists as a result of operating the zinc oxide pits.

IV. CHEMETCO'S 1985 REVISED PART A APPLICATION

In this section Chemetco will discuss each of the nine units that were listed on its revised Part A application submitted November 8, 1985. As the following discussion

demonstrates, the zinc oxide storage pile, listed on Chemetco's 1987 revised Part A application, is the only one of these nine listed units that may be a RCRA regulated unit. It was therefore not necessary to list the remaining units on the 1985 Part A application, and Chemetco need not comply with closure requirements for these other units.

A. Tote Boxes

Chemetco unnecessarily listed prospective tote boxes on Line 1 of Part III of the 1985 revised Part A application with process code S01, indicating a storage container. This listing comprises tote boxes of a particular kind that would have been used for material handling had Chemetco implemented prospective plans that had been developed for handling RCRA regulated material. These tote boxes were never purchased or put into operation and thus need not have been listed on Chemetco's 1985 or 1987 revised Part A applications.

B. Proposed Tankage in the Cooling Water Canal

At the time Chemetco filed its 1985 revised Part A application it planned to convert a portion of its cooling water canal into concrete-lined tankage for use in collecting storm water runoff and possibly for use as a process unit.

This prospective unit was listed on Line 2 of Part III of the 1985 revised Part A application with process code S02, indicating a storage tank.

This listing on the 1985 revised Part A application did not refer to the cooling water canal itself, which was never used or intended for use in handling hazardous waste and was therefore not a RCRA regulated unit. The planned conversion of the canal to concrete-lined tankage was not undertaken, and the listed proposed unit never existed. It was therefore unnecessary to list the proposed unit on Chemetco's 1985 or 1987 revised Part A applications. The former cooling water canal has now been taken out of operation and cleaned. Chemetco no longer plans to convert any part of it for use in handling RCRA regulated materials.

C. Proposed Storage Pile

As a protective measure Chemetco listed a proposed storage pile on Line 3 of Part III of the 1985 revised Part A application with process code S03, indicating a storage pile. This proposed storage pile was intended to be used for temporary storage of material prior to its recycling in the rotary converters, i.e., as a staging area. The proposed storage pile was to have been located east of the foundry. However, the pile was never created and never existed. It was therefore unnecessary to list the proposed pile on the 1985 or 1987 revised Part A applications.

D. Zinc Oxide Storage Pile

Chemetco's zinc oxide storage pile was listed on Line 4 of Part III of the 1985 revised Part A application.

This unit is now listed on Chemetco's 1987 revised Part A application.

E. Tanks

Proposed and existing tanks were prospectively listed on Line 5 of Part III of the 1985 revised Part A application with process code Tol, indicating treatment tanks. This listing includes a proposed "tank farm" consisting of a number of tanks that would have been located to the northeast of the foundry. The tank farm was proposed for use in treating material potentially subject to RCRA regulation. This listing also included other tanks existing at the time of the application that were listed prospectively so that they could be used in conjunction with and for the same purpose as the tanks in the proposed tank farm. However, Chemetco did not construct or operate any part of the proposed tank farm, nor did it place any of the other listed tanks into service for the purpose for which they had been listed together with the proposed tank farm. Because the tank farm and related tanks were listed entirely prospectively, they need not have been listed on Chemetco's 1985 or 1987 revised Part A applications and need not be closed.

F. Concrete-Lined Zinc Oxide Settling Pit

Chemetco currently uses a dual-compartment concretelined pit, located east of the foundry, for recycling the zinc oxide material that is contained in the slurry produced by the wet scrubber system. This settling pit, also referred to as the "Polish pit," is used to settle the solids out of the slurry to facilitate recycling of the zinc oxide material. The zinc oxide slurry initially enters the north compartment of the pit. Gravity causes the liquid to move into the south compartment of the pit, thus concentrating the zinc oxide material in the north compartment. The concrete-lined zinc oxide settling pit was listed on Line 6 of Part III of the 1985 revised Part A application with process code TO2, indicating a treatment surface impoundment.

Following settling and dewatering in the concrete-lined zinc oxide settling pit, the zinc oxide material is dewatered further in a plate filter press and shipped offsite for additional recycling. Chemetco's current production of zinc oxide material is sold for reclamation and for direct use to produce products (e.g., zinc sulfate). Chemetco ships approximately 100 to 120 tons of the zinc oxide material offsite for recycling per week. The settling pit itself is not, and has not been, used for storage of the zinc oxide material — only for recycling the material. The zinc oxide material is removed from the north compartment of the pit two times per week and from the south compartment once per week.

Chemetco listed the concrete-lined zinc oxide settling pit on its 1985 revised Part A application prospectively and out of an abundance of caution. At that time Chemetco thought that the settling pit would possibly be used in the future to handle RCRA regulated material and that if the pit were used for this purpose it would perhaps be subject to RCRA regulation. As discussed below, Chemetco's basis for listing

the concrete-lined zinc oxide settling pit as a regulated hazardous waste management unit was mistaken. Thus, it was unnecessary to list the pit on the 1985 revised Part A application and it need not have been listed on Chemetco's 1987 revised Part A application.

The first reason the concrete-lined zinc oxide settling pit is not a regulated hazardous waste management unit is that it has not been used for handling hazardous waste. zinc oxide material is either a sludge or by-product of Chemetco's secondary copper smelting operations. See 40 C.F.R. §§ 260.10, 261.1(c)(2)&(3); 35 Ill. Adm. Code §§ 721.110, 721.101(c)(2)&(3). The recocling of the zinc oxide material by recyclers may be characterized as either reclamation or direct use to make a product. See 40 C.F.R. § 261.1(c)(4)&(5); 35 Ill. Adm. Code § 721.101(c)(4)&(5). All previous recycling of the zinc oxide material from the settling pits was similarly reclamation or use to make a product. Even if the zinc oxide material exhibits a characteristic of hazardous waste it is not a solid waste because sludges and by-products that exhibit a characteristic of hazardous waste are not solid wastes when they are reclaimed. 40 C.F.R. § 261.2(c)(3) and Table 1; 35 Ill. Adm. Code § 721.102(c)(3) and Appendix Z. Nor are such materials solid wastes when they are used as ingredients to make a product. 40 C.F.R. § 261.2(e)(1)(i); 35 Ill. Adm. Code § 721.102(e)(1)(A). Because the zinc oxide material is not a solid waste it is not a hazardous waste. 40 C.F.R. § 261.3(a);

35 Ill. Adm. Code § 721.103(a). Since the concrete-lined zinc oxide settling pit has not been and is not used to handle hazardous waste, it is not a regulated hazardous waste management unit.

The concrete-lined zinc oxide settling pit is also unregulated for a second, separate reason. As explained above, the concrete-lined zinc oxide settling pit is the starting point, and thus an integral part, of the process of recycling the zinc oxide material. Dewatering of a material prior to further recycling is recognized as part of the recycling process. See 50 Fed. Reg. 614, 639 (Jan. 4, 1985); 48 Fed. Reg. 14472, 14487 (Apr. 4, 1983). The settling that occurs in the zinc oxide settling pit facilitates the recovery of metal values, is necessary to material recovery, and therefore constitutes recycling. See 50 Fed. Reg. 614, 639 (Jan 4, 1985). Because the recycling process is exempt from regulation, the zinc oxide settling pit is not a regulated hazardous waste management unit. See 40 C.F.R. § 261.6(c)(1); 35 Ill. Adm. Code § 721.106(c)(1); 50 Fed. Reg. 33541, 33542 (Aug. 20, 1985).

G. Zinc Oxide Dewatering Equipment

In addition to the zinc oxide settling pits, Chemetco has used several types of mechanical equipment to dewater the zinc oxide slurry produced by the wet scrubbers. This

dewatering equipment has included at different times a centrifuge, a belt filter and a plate filter press. These devices are included in the listing on Line 7 of Part III of the 1985 revised Part A application with a process code T04, indicating a treatment unit.

The centrifuge was located immediately to the southeast of the pump house. Chemetco has not used a centrifuge in the time period from 1980 to the present. When the centrifuge was taken out of operation it was cleaned and sold. Zinc oxide material in the area of centrifuge operation was cleaned up and either sold or taken to the zinc oxide storage pile.

The belt filter, also called the belt press, was located to the east of the north compartment of the concrete-lined zinc oxide settling pit. The belt filter was used only on an experimental basis. It was leased by Chemetco, is no longer used and was removed from the site. When the belt filter was taken out of operation it was scraped and washed on a concrete pad and sent back to its owner. The concrete pad was then cleaned up.

Chemetco uses a plate filter press for dewatering the zinc oxide material in its current zinc oxide recycling operations. The plate filter press is located in the tank house to the southeast of the foundry.

These dewatering devices are and were used only in the process of recycling the zinc oxide material and not for any

other treatment or storage purpose. They were not regulated hazardous waste management units, <u>see</u> 40 C.F.R. § 261.6(c)(1); 35 Ill. Adm. Code § 721.106(c)(1); 50 Fed. Reg. 33541, 33542 (Aug. 20, 1985), and need not have been listed on Chemetco's 1985 revised Part A application or on its 1987 revised Part A application.

H. Proposed Evaporators and Solidifier

At the time Chemetco submitted its 1985 revised Part A application it had developed plans to install evaporators near the proposed tank farm described above to be used for removing moisture in the prospective operation of the tank farm. The proposed evaporators were listed on Line 8 of Part III of the 1985 revised Part A application with process code T04, indicating a treatment unit. These evaporators were entirely prospective and were never constructed or installed.

Chemetco also was considering at the time it submitted its 1985 revised Part A application plans to install a solidifier as part of a proposed process to treat materials potentially subject to RCRA regulation. The solidifier would have been located in a proposed building to the east of the foundry. The proposed solidifier was listed on Line 9 of Part III of the 1985 revised Part A application with process code T04, indicating a treatment unit. The listing was entirely prospective and the solidifier was never constructed or installed.

Because they were never in operation, the evaporators and solidifier therefore need not have been listed on the 1985 or 1987 revised Part A applications.

I. Summary

As on the 1980 original Part A application, the zinc oxide storage pile is the only unit listed on the 1985 revised Part A application that may now be a RCRA regulated unit. That unit is listed on Chemetco's 1987 revised Part A application. Several of the listings on the 1985 revised Part A application were entirely prospective and were listed according to plans that were never put into operation: the tote boxes, the concrete-lined tankage planned for the site of the cooling water canal, the proposed storage pile, the proposed tank farm and related tanks, the proposed evaporators and the proposed solidifier. None of the units used for recycling the zinc oxide material, encompassing the concrete-lined zinc oxide settling pit and the mechanical dewatering equipment, were regulated units because the recycling process is exempt from regulation.

V. SUMMARY OF STATUS FOR UNITS LISTED ON CHEMETCO'S RCRA PART A APPLICATIONS

A. Chemetco's 1980 Original Part A Application

<u>Line</u>	Code	<u>Unit</u>	<u>Status</u>
1	S04	Zinc oxide storage pile	May be subject to RCRA regulation at present time: possible speculative accumulation.
		Zinc oxide settling pits	Not regulated: exempt from regulation as a recycling process unit.
2	sò3	Pot slag storage pile	Not regulated: material was not a hazardous waste; material was held for recycling.
3	S02	Black acid storage tank	Not regulated: material was a product and thus not a hazardous waste; material was used beneficially or held for beneficial use.
4	S01	Drums of trichloro- ethylene	Not regulated: material was not a hazardous waste; empty containers exempt from regulation.

B. Chemetco's 1985 Revised Part A Application

Line	Code	<u>Unit</u>	Status
1	S01	Tote boxes	Prospectively listed: never existed.
2	S02	Proposed tankage in cooling water canal	Prospectively listed: never constructed or placed in operation.
3	S03	Proposed storage pile	Prospectively listed: never existed.

<u>Line</u>	Code	<u>Unit</u>	Status
4	S04	Zinc oxide storage pile	May be subject to RCRA regulation at present time: possible speculative accumulation.
5	T01	Proposed tank farm and related tanks	Prospectively listed: most tanks were never constructed; none of the tanks was ever placed in operation.
6	T02	Concrete- lined zinc oxide set- tling pit	Not regulated: not used for hazardous waste; exempt from regulation as a recycling process unit.
7	T04	Zinc oxide dewatering equipment	Not regulated: exempt from regulation as a recycling process unit.
8	T04	Proposed evaporators	Prospectively listed: never constructed or installed.
9	T04	Proposed solidifier	Prospectively listed: never constructed or installed.

Respectfully submitted,

Robert F. Van Voorhees

Mark B. Halverson

BRYAN, CAVE, MCPHEETERS AND MCROBERTS

1015 Fifteenth Street, N.W.

Suite 1000

Washington, D.C. 20005

(202) 289-6100

Counsel for Chemetco, Inc.

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- 2. Operating Permit No. 8207005 for air pollution control equipment.
- 3. Operating Permit No. 86040033 for baghouses.

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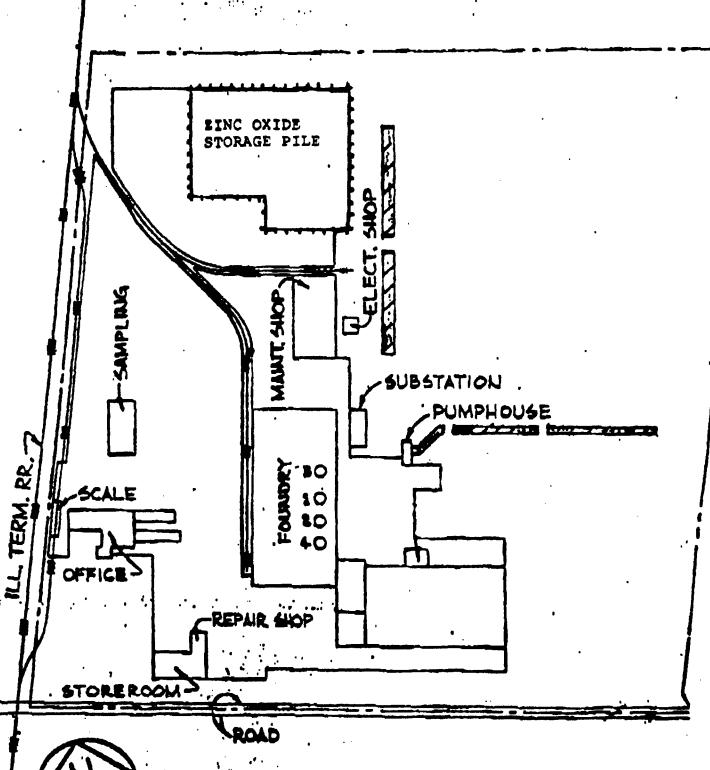
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V. DESCRIPTION OF HAZARDOUS WASTES (CC)		M. Charles and the state of the
E. USE THIS SPACE TO LIST ADDITIONAL PRO-	CESS CODES FROM ITEM D(1) ON	PAGE 3.
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EPA 1.D. NO. (enter from page 1)		
FIL D048843809 6		•
V. FACILITY DRAWING		and the second second second second second
All existing facilities must include in the space provided on		estructions for more detail).
VI. PHOTOGRAPHS		
All existing facilities must include photographs (seri	is or around found that clearly deline	este all evicting structures; evicting storage
treatment and disposal areas; and sites of future stor	race, treatment or disposal areas (see i	instructions for more detail).
VII. FACILITY GEOGRAPHIC LOCATION		The second secon
LATITUDE (degrees, minutes, & seconds) LC	ONGITUDE (degrees, minutes, & seconds)
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A. If the facility owner is also the facility operator as	listed in Section VIII on Form 1 "General	Information", place an "X" in the box to the left and
skip to Section (X below,	K.	
9 M the facility surper is not the Amilia, according	•	the fallowing leaves
3. If the facility owner is not the facility operator as I	IRISO IN SECTION ALLI ON LOUD A" COLLEGER	pre reacting terms.
1. NAME OF FACI	LITY'S LEGAL OWNER	g. PHONE NO. (area code & no.)
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3. STREET OR P.O. SOX	4. CITY OR TOW	R S.ST. 6. ZIP CODE
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EX. OWNER CERTIFICATION		
I certify under penalty of law that I have personally		
documents, and that based on my inquiry of those in	ndividuals immediately responsible to	r obtaining the information, I believe that the
submitted information is true, accurate, and comple including the possibility of fine and imprisonment.		at penalties for atomitting laise unformation,
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas G. McRaven, Treasurer	126	7-10-87
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X, OPERATOR CERTIFICATION		新的一篇 10 mm - 10 mm - 12 mm -
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submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	te, I am aware that there are significa-	nt penalties for submitting talse information,
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Thomas G. McRaven, Treasurer	1 30-	7-10-8/
	125	
EPA Form 3510-3 (6-80)	PAGE 4 OF 5	CONTINUE ON PAGE

IV. Description of Hazardous Wastes

Chemetco is filing this Part A application to allow storage in a concrete-lined storage pile of recyclable zinc oxide material when it is accumulated speculatively. The material stored in the pile will be a RCRA regulated material when it is accumulated speculatively if it has a characteristic of EP toxicity, but the zinc oxide material is not a hazardous waste per se. The zinc oxide is being stored for sale and reclamation, not for treatment or disposal as a hazardous waste.





(HEMETCO

AG. BOX 97 - ALTON, ELLINOIS BROSS

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VI. LO LOCATION HUT 3 & DILDENES	URG SZÜ: hethe tal for	RE RE	u need to sted in the uestion, yo	submit any permit applica parenthesis following the ou need not submit any of	question. Mark "X" in the box in these forms. You may answer "no	Review is incorrect town A first the same of the same	v the correct deutilities of the correct deutilities of the correct deutilities of the correct ded. I determine the complete of the correct deutilities of t	information to the state of any of a to the symmetric of the symmetric of the symmetric of the symmetry of the
SPECIFIC QUESTIONS	744	MAE	K 'X'	SPECIF	IC QUESTIONS	783	MAR	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facilinclude a concentrate equatic enimal produ	lity (either existing or proposed) and animal feeding operation or uction facility which results in a fee U.S.? (FORM 2B)	19	X	ATTACHE
C. is this a facility which currently results in discharges to waters of the U.S. other than those described in	1 1				cility fother than those described hich will result in a discharge to		y.	
A or 8 above? (FORM 2C) E. Does or will this facility treat, store, or dispose of hezerdous wastes? (FORM 3)	×	2 2		municipal affluent be taining within one	FORM 2D) inject at this facility industrial or elow the lowermost stratum con- quarter mile of the well bore, of drinking water? (FORM 4)	31	χ χ	\$ 7 \$3
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas pro- duction, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	34	X	•	cial processes such a process, solution mir tion of fossil fuel, or (FORM 4)	nject at this facility fluids for spe- is mining of sulfur by the Frasch ning of minerals, in situ combus- r recovery of geothermal energy?	27	X	
 Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in- structions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) 	4	X		NOT one of the 28 instructions and which per year of any air po	posed stationary source which is industrial categories listed in the ch will potentially emit 250 tons cllutant regulated under the Clean ect or be focated in an attainment		χ.	
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SKIP CHEMETCO INC	·	<u>.</u>	•					
IV. FACILITY CONTACT	- P. M.						مر چیداد. مدمند کرن	
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PA Form 3510-1 (6-80)				4 10 00	E N H CONT	NUE	ON	REVERS

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

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utline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous wastness, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface bodies in the map area. See instructions for precise requirements. ITURE OF BUSINESS (provide a brief description) Secondary copper smelter with an electrolytic refinery for producing copper cathode	ce
	•
ERTIFICATION (see Instructions)	
tify under penalty of law that I have personally examined and am familiar with the information submitted in this application and the homents and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the cation, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting information, including the possibility of fine and imprisonment.	A 24
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IV DE	CCDID	TION (ヘモリムフィ	PHOTIC	WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—oight number from 40 ChH, Support D for each listed hazardous waste you will handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- E. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS......P
TONS.....T

METRIC UNIT OF MEASURE CODE
KILOGRAMS......K
METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code/s/.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes to corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	1.4	Ą	E	A				MEA											D. PROCESSES
NO.	H. W.A (e)	45	T	N	0	B. ESTIMATED ANNUAL QUANTITY OF WASTE	(e	JRE nter ode)				1	. PI		CE!	ODE	\$		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-2	D	0	•]	0	2	400		P	7	7	0	3	D	8	0	1		1 1	
X-3	D	0	7	9	1	100		P	7	<u> </u>	0	3	D	8	0	7		1 1	
X-4	D	0	7	0	2					T	7				1	Т	1	ŢŢ	included with above

PA Form 3510-3 (6-80) .

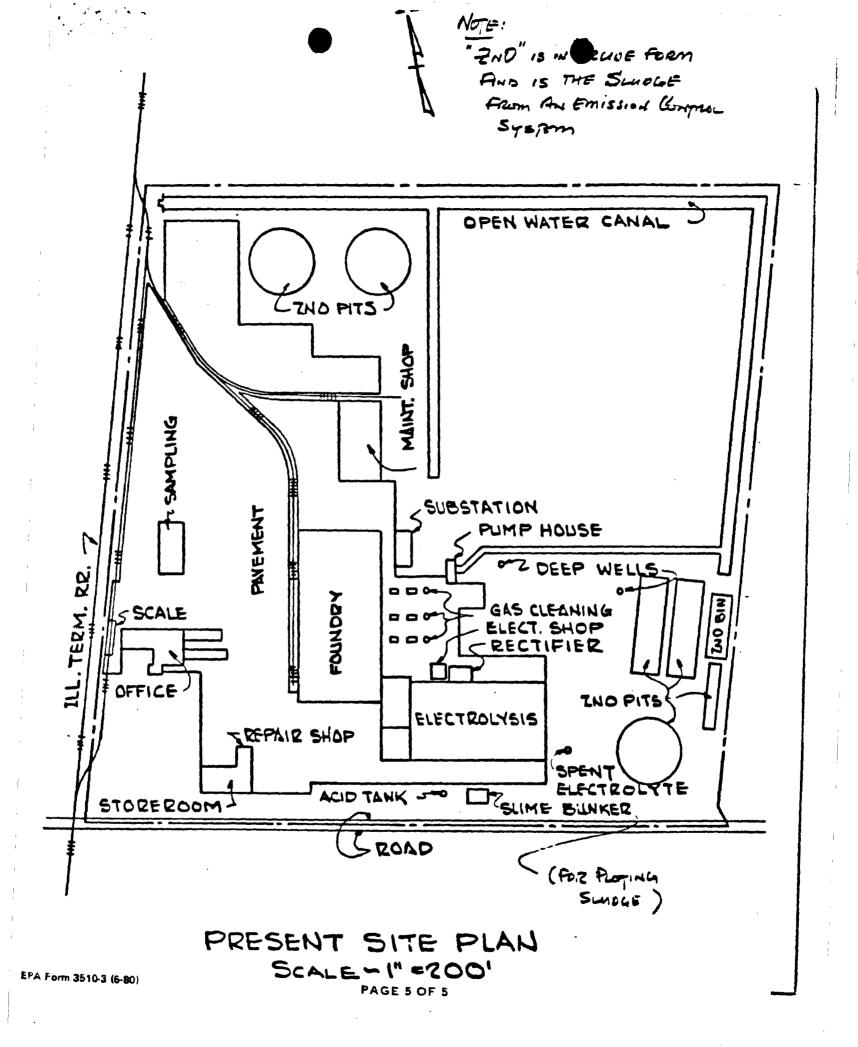
FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) W D 0 4 8 8 4 3 8 0 9 DUP DUP V. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTE NO B. ESTIMATED ANNUAL QUANTITY OF WASTE 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) F 0 0 2 50 G 5 0 1 F 0 0 7 7300000 S 0 2 F 0 0 8 56100 G S 0 1 U 0 4 3 50 G S 0 1 5 2 U 1 9 G 50 S 0 1 6 U 2 2 50 6 G S 0 1 7 9 K O 6 822 S 0 4 8 9 K 10 16 822 T S 0 3 9 10 1 2 4 5 6 7 8 £; 21 22 13 24 25 26 PA Form 3510-3 (6-80) CONTINUE ON REVERSE

Form Approved OMB No. 158-S80004

ntinued from page 2.

TE: Photocopy this page before completing if you have more than 26 wastes to list.

DESCRIPTION OF HAZARDOUS WASTES (continu				
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EPA I.D. NO. (enter from page 1)				
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HOTOGRAPHS	Descrie of awing of	the racinity isse mistractions	io more detaily.	and the second
existing facilities must include photographs (aerial or	r ground—level) th	at clearly delineate all ex	isting structures;	existing storage,
tment and disposal areas, and sites of future storage,	, treatment or disp	osal areas <i>(see instructio)</i>	ns for more detail)	
FACILITY GEOGRAPHIC LOCATION				
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FACILITY OWNER			And the second	
 A. If the facility owner is also the facility operator as listed skip to Section IX below. 	d in Section VIII on F	orm 1, "General Information	on", place an "X" in	the box to the left and
B If the facility owner is not the facility operator as listed	in Section VIII on F	orm 1, complete the follow		
1. NAME OF FACILITY	'S LEGAL OWNER		2. PH	DNE NO. (arec code & ho
CHEMETCO			6 1 8	3 - 2 5 4 - 4 3 8
3. STREET OR P.O. BOX		LCITY OR TOWN	5. ST.	6. ZIP CODE
P. O. Box 187	G ALTON		IL	6 2 0 0 2
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tify under penalty of law that I have personally example	mined and am fam	iliar with the informatio	n submitted in thi	s and all attached
ments, and that based on my inquiry of those indivi-	iduals immediately	responsible for obtaining	ng the information	, I believe that the
aitted information is true, accurate, and complete. I ding the possibility of fine and imprisonment.	am aware that the	re are significant penalti	es for submitting t	false information,
	SIGNATURE		C. DATE	SIGNED
John M. Suarez	1.0	9	9	7-80
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tify under penalty of law that I have personally examined that have on my inquiry of those indiv	mined and am fam	iliar with the informatio	n submitted in thi	s and all attached
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	SIGNATURE	·	C. DATE	SIGNED
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Form 3510-3 (6-80)	`			CONTINUE ON PAG



CHEMETCO ROUTE 3 & OLDENBERG ROAD HARTFORD, ILLINOIS 62048

6 H A R T F O R D

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C. THIRD			D. FOURTH
(specify)	1 5	(specify)	Sec. 1
19 16 - 19	 	16 - 19	
VIII. OPERATOR INFORMATION	· · · · · · · · · · · · · · · · · · ·	THE REPORT OF THE PROPERTY.	A THE STATE OF THE PARTY OF THE
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C. STATUS OF OPERATOR (Enter the appr	opriate latter into the answer box	; if "Other", specify.)	D. PHONE (area code & no.)
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13- 16-		40 41 42 47 - 9	52 TES (X) NO
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A. NPDES (Discharges to Surface water)	D. PSD (Air Emissions from	Proposed Sources/	State of the state
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III. PROCES	SES - CODES AN	YD DESIGN CAL	ACITIES			:-:					1. 3	e.j	- -
A. PROCESS	CODE - Enter the codes. If more lines are	ode from the list of	process con	dee bei	ow the	t best	describes e	ech process to be	used at the faci	lity. Ten l	ines are	provid	ded for
describe th	e process (including i	ts design capacity)	in the speci	provid	ded on	the fo	em (Item I	II-C).	,	,			
1. AMOU	DESIGN CAPACITY NT - Enter the amou	nt,						•	-		· , ·		
measure	F MEASURE - For used. Only the unit	s of measure that a	re listed bel	ow sho	uid be	used.		he list of unit mea	ure codes below				
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PA Form 3510	-3 (6-80)			_	AGE								VERSE



III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE
INCLUDE DESIGN CAPACITY.

OTHER PROCESSES

Line # 7 - TO4 - Belt Filter, Plate filter, Centrifuge

Line # 8 - T04 - Evaporators

Line # 9 - TO4 - Solidifier

_					
IV	DESCR	IPTION :	OF HAD	7 A R DOLLS	WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Support D for each listed hazardous waste you will nandle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed weste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column 8 enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDS	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hezardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hezardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	Г	A. EPA HAZARD. B. ESTIMATED ANNUAL		C. UNIT				_). PROCESSES			
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PAGE 3 A OF 5 (enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)



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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

C. DATE SIGNED

Thomas G. McRaven

PAGE 4 OF 5

Nov 7 1985

Contract to the contract of th

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

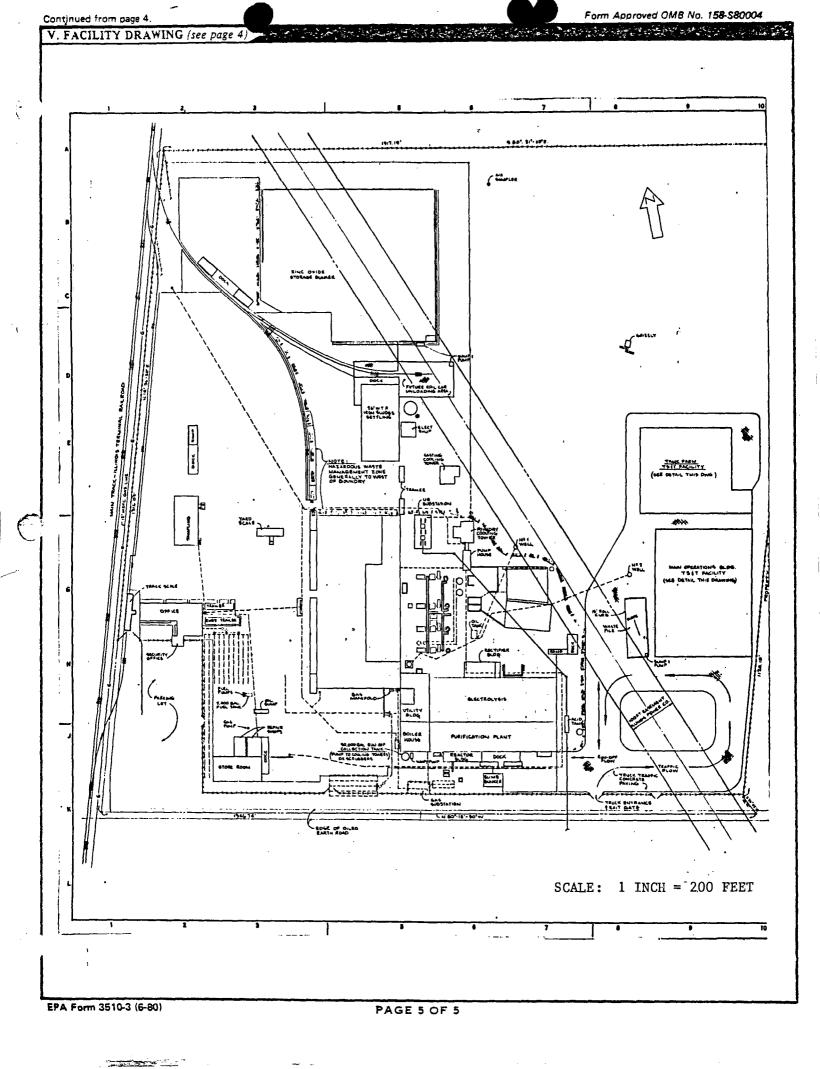
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PAGE 3 C OF 5
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V. FACILITY DRAWING All existing facilities must include in the space provided of	n page 5 a scale drawing of the facility (see instruction	ons for more detail).	
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All existing facilities must include photographs (active treatment and disposal areas; and sites of future st	orage, treatment or disposal areas (see instruc		
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B. FACILITY DESCRIPTION

B-1 General Description

Chemetco operates a secondary copper smelter outside of St. Louis, Missouri. This facility is near the intersection of Highways 3 and 203, north of Alton, Illinois. This smelter processes copper and tin scrap from all over the United States. Anode copper and lead/tin are poured into anodes for further processing at another facility. The smelting process generates several byproducts-slag and zinc oxide - which may require extended storage periods and/or treatment prior to sale. The slag tests out as EPA nonhazardous. The zinc oxide is EP Toxic. The zinc oxide material is produced when the smelter off gases are scrubbed with caustic liquors in venturi scrubbers. Zinc oxide material is produced. It is then dewatered, stored, and sold as-is; or is further processed on-site.

The types of industries which are serviced through the off-site facilities include but are not limited to:

- * Electronics industries;
- * Plating and metal finishing industry;
- * Defense industry;
- * Automotive industry;
- * Hazardous waste management industry;
- * Scrap metals industry;
- * Chemical industry;
- * Communications industry;
- * Construction industry;

B-2 Topographic Map

B-2a General Requirements

A set of maps are attached which include contours, floodplain, surface waters, land uses, wind rose, north, legal boundaries, access control, buildings, structures, loading and unloading areas, flood control or drainage barriers, run-off control, hazardous waste management units and solid waste management units. These maps can be found in the Appendix B-1.

B-2b Additional Requirements

Figure B-1 shows the groundwater monitoring well locations with facility and property boundaries. The plume of contamination in the uppermost sand layer is also shown on this same map.

B-3b Floodplain Standard

The facility is within the 100-year floodplain as indicated by the $\,$ USGS $\,$ map .

B-3b(1) Demonstration of Compliance

A regional levee has been constructed which is designed to prevent floodwaters from contacting the facility. See USGS map in Appendix B-1. The facility is bounded on the west by a railroad dike which provides a secondary flood barrier.

B-3b(1)(a) Floodproofing and Flood Protection Measures

B-3b(1)(b) Floodplain

All drums stored outside will be transferred into the enclosed and raised drum storage area. This will take 2 hours to accomplish. The potential for accidental discharge is no greater than during normal operations.

All material stored in the covered waste pile will either be moved into the enclosed and raised drum storage area or will be placed on top of the zinc oxide in the impoundment area. This job will take 8 hours to accomplish using 2 front end loaders and 4 dump trucks. The potential for accidental discharge is no greater than during normal operations.

B-3b(2) Waiver

No waiver is requested.

B-3b(3) Plan for Future Compliance

The facility is in compliance.

B-4 Traffic Information

Currently, 94% of all outside traffic entering the facility enters thru the security guarded southwest corner (truck weigh station). This traffic is due almost exclusively to scrap being delivered for reclaiming. Approximately 6 18-wheeler tractor/trailer rigs enter and leave each hour during the hours of 7 AM and 4 PM. This traffic is confined to the west and southwest side of the facility. The remaining 5% of outside traffic comes through the guarded gate outside of maintenance on the west end of south fence. This traffic is deliveries made to Shipping-Receiving.

Four front-end loaders operate continuously in the immediate area west and north of the converters. A front-end loader also operates 1-2 times per hour in moving zinc oxide sludge from the belt press east of the scrubber area to the mixing tank south of the electrolysis area. Slag is transported from the converter continuously by a special transporter designed to carry the "kettle" from the converter to the slag pile. A front-end loader operates continuously in moving the slag from the cooling area to the top of the slag pile. Forklifts operate continuously in the areas west and south of the converter. Transportation of people within the facility is done by one of two four-wheel drive "jeeps".

A third entrance in the middle of the south fence gets 1% of the traffic. This gate is for receipt of "Hazardous Manifested" loads of metal containing wastes.

All road surfacing to west, south and immediately north and east of the converters is concrete. Outlying areas are covered with Chemetco slag. The road to the slag pile is made of a high load bearing slag from a steel mill. The on-site speed limit is 15 MPH. There are no traffic signals or other control devices.

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III. PROCESSES (continued)					
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MA

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpert D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
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TONS	METRIC TONS,

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to Indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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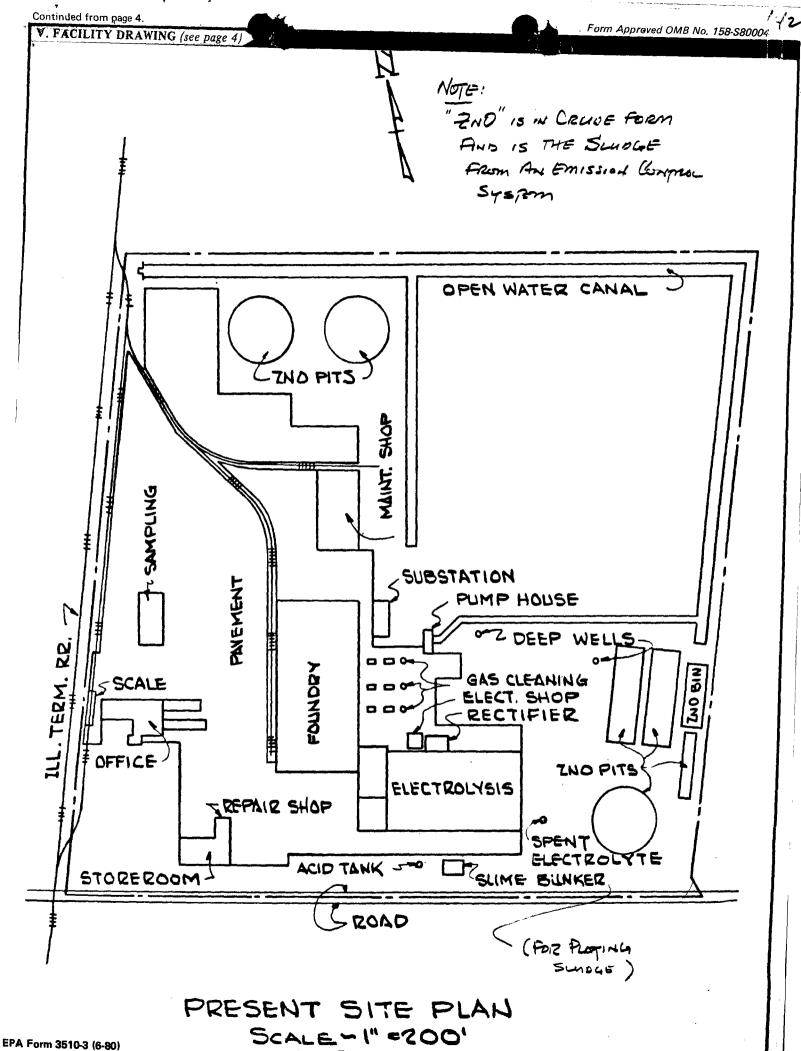
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V. FACILITY DRAWING		4		
All existing facilities must include in the space provided on	page 5 a scale drawing of the fa	cility (see instructions for more	detail). F6: 8/65	
VI. PHOTOGRAPHS				
All existing facilities must include photographs (aeric	al or ground-level) that cl	early delineate all existing sti	ructures; existing storage, Bore detail).	;
treatment and disposal areas; and sites of future stor	age, treatment or disposal	areas (see instructions for me	ore detail).	6
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